# ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPIETARY NETWORK INFORMATION (CPNI) COMPLIANCE Calendar Year 2018 LEAD TELECOM, CORP.

### EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for:

Calendar Year 2018

Date filled:

February 28, 2019

Name of The Company covered by this certification:

Lead Telecom, Corp.

Form 499 Filer ID: 828634

Name of Signatory: Faustino Castro

Title of Signatory: President

### I, Faustino Castro, certify and state that:

- I am an officer of the company named above (Lead Telecom Corp.), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.
- Attached to this certification, as Attachment A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 et seq. of the Commission's rules.
- 3. The company **has not** taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
- 4. The company **has not** received any customer complaints in the past year concerning the unauthorized release of CPNI.
- 5. The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 offthe U.S. Code and may subject it to enforcement action.

Signed

Faustino Castro President

LEAD TELECOM CORP.

Date Feb 28, 2019

Attachments: Statement explaining CPNI Procedures – Attachment A.

Explanation of actions taken against data brokers - Not applicable

Summary of customer complaints – Not applicable

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#### ATTACHMENT A

## Statement of CPNI Procedures and Compliance

Lead Telecom Corp. ("LEAD") provides <u>wholesale telecommunication services</u> to other carriers and as such doesn't have any subscriber or direct service relationship with any business or residential end user customers. LEAD does not obtain, retain or use CPNI for any purpose.

Although LEAD has call detail records, LEAD does not have any information regarding the calling or called party, and such information is not used for marketing purposes. LEAD is committed to protecting the confidentiality of all customer information, including CPNI and call detail records. LEAD employees are prohibited from disclosing such information and LEAD has procedures which provide for disciplinary action for such violations, up to and including termination of employment.

Moreover, LEAD does not market their services to end users in any fashion. Instead, marketing efforts are directed towards resellers and other carriers. Marketing efforts do not include the use of CPNI or call detail records.

LEAD does not disclose call record information over the telephone.

LEAD does not disclose detail records on-line.

LEAD does not have any retail locations and therefore does not disclose call detail records in-store.

Should LEAD expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart D, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI, including call detail records, is used or disclosed.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

LEAD has in place procedures to notify law enforcement in the event of a breach of customers' CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, LEAD has a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, to the extent possible.

LEAD has not taken any actions against data brokers in the last year.

LEAD did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2018.

LEAD has not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.